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FILED
DISTRICT COURT OF GUAM
SEP 26 2003
MARY L. M. MORAN
CLERK OF COURT

64

Counsel for Plaintiffs LOUIS VUITTON
MALLETIER, CHANEL, INC. and
PRADA, S.A.

UNITED STATES DISTRICT COURT OF GUAM

LOUIS VUITTON MALLETIER and
CHANEL, INC., and PRADA, S.A.

Plaintiffs,

vs.

HANA TRADE CORPORATION
dba HONOLULU GIFT SHOP aka
U.S.A. T-SHIRTS AND GIFT
ITEMS, VENDOR DOE II aka SU
KIM, VENDOR DOE III, KIM CHOL
KUN dba ANGELUS, VENDOR
DOE IV dba LISA'S, EDWARD P.
PAK, aka VENDOR DOE V dba
FASHION CITY, CONNIE C.
IMBUIDO, aka VENDOR DOE VI
dba CORALYN'S VARIETIES,
ANGIE D. WOLFORD aka
VENDOR DOE VII dba TRINITY'S
VARIETIES and DOES I THROUGH
XX,

Defendants.

CIVIL CASE NO. 03-00013

**SUPPLEMENTAL DECLARATION IN
SUPPORT OF MOTION FOR ENTRY
OF DEFAULT AND STATUTORY
DAMAGES AGAINST DEFENDANT
HANA TRADE CORPORATION AS
PER ORDER OF THE COURT**

ORIGINAL

I, JOAQUIN C. ARRIOLA, JR., being attorney for the Plaintiffs declare and state as follows:

1. I am an attorney of record for plaintiffs Louis Vuitton Malletier, Chanel, Inc., and Prada S.A., in the above-captioned case. I make this supplemental declaration in support of the Plaintiffs' motion for entry of default and for statutory damages against Defendant Hana Trade Corporation, and pursuant to the order of the Court on September 12, 2003.

2. In the course of pursuing remedies granted to the Plaintiffs under the Lanham Act against the Defendants for violation of federal trademark and copyright laws, I and two other attorneys with my firm have provided legal services in this matter. The legal services provided include interviewing witnesses, investigating potential defendants, drafting of the complaint, drafting and filing a motion for restraining order and seizure order, drafting and filing declarations in support of the motions, drafting and filing a motion to seal the matter, preparing and executing the two restraining orders with the assistance of United States and Superior Court Marshals, conducting an inventory of the items seized, drafting and filing an amended complaint, drafting and filing a motion for entry of default judgment, and appearing in court. Plaintiffs have incurred attorney's fees in the total amount of \$22,107.27 for prosecution of this matter.

3. My hourly rate is \$195.00. The hourly rate of Anita P. Arriola is \$215.00. The hourly rate of Jacqueline T. Terlaje is \$175.00. Based on our experience in the legal profession and based on the agreed upon fee in this matter, our rates are reasonable for the services rendered in this matter. Additionally, the rates are reasonable for attorneys with like skill and experience.

4. The Plaintiffs do not seek a recovery of attorney's fees in this case. However, in determining the statutory damages, Plaintiffs submit the total costs and attorney's fees for consideration in the court's determination of the dual purpose of compensatory and punitive damages pursuant to 15 U.S.C. §1117(c).

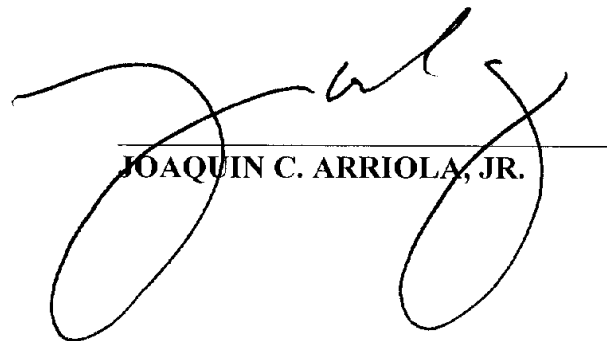
5. Through the September 12, 2003 hearing on Plaintiff's Motion for Default Judgment, the total costs incurred for assistance of the United States Marshals in the seizures and raids is \$4,292.22. On September 22, 2003, the Plaintiff's were reimbursed the amount of \$2,767.80, reducing the overall costs for Marshal Services to \$1,524.42.

6. Through the September 12, 2003 hearing on Plaintiff's Motion for Default Judgment, Plaintiffs incurred other costs, which include service of process, copying documents for filing, hiring personnel for inventory, conference calls for clients located primarily in Hong Kong and Europe, and paralegal services, in the total amount of \$2,360.75.

7. The costs and attorney's fees incurred in this matter were necessary to the prosecution of this matter.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated this 26th day of September, 2003.


JOAQUIN C. ARRIOLA, JR.